

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

Sensa Verogna,

Plaintiff,

v.

Twitter, Inc.,

Defendant.

Civil Case No. 1:20-cv-00536-SM

**TWITTER, INC.'S OBJECTION TO
PLAINTIFF'S MOTION TO DECLARE
TWITTER A PUBLIC ACCOMMODATION UNDER LAW**

Defendant, Twitter, Inc. ("Twitter"), by and through its undersigned counsel, Orr & Reno, Professional Association, respectfully objects to Plaintiff's Motion to Declare Twitter a Public Accommodation Under Law [Doc. 5]. In support of its objection, Twitter submits herewith Twitter, Inc.'s Memorandum of Law in Support of Its Objections to Plaintiffs' Motions for Declaratory Relief.

WHEREFORE, the Defendant, Twitter, Inc., respectfully requests that this Honorable Court:

- A. Deny Plaintiff's Motion to Declare Twitter a Public Accommodation Under Law;
- and
- B. Grant such other and further relief as the Court deems just.

Respectfully submitted,

Twitter, Inc.

By its attorneys,

Dated: June 12, 2020

By: /s/ Jonathan M. Eck
Jonathan M. Eck, Esq. (NH Bar #17684)
Orr & Reno, Professional Association
45 S. Main Street, P.O. Box 3550
Concord, NH 03302
(603) 223-9100
jeck@orr-reno.com

Julie E. Schwartz, Esq. (*motion for pro hac vice
admission pending*)
Perkins Coie LLP
3150 Porter Drive
Palo Alto, CA 94304-1212
(650) 838-4490
JSchwartz@perkinscoie.com

CERTIFICATE OF SERVICE

I, Jonathan M. Eck, certify that on this date service of the foregoing document was made upon the Plaintiff, *pro se*, via email.

Dated: June 12, 2020

/s/ Jonathan M. Eck
Jonathan M. Eck, Esq. (NH Bar #17684)